Sumanta Banerjee 58/1 Ballygunje Circular Road Kolkata, West Bengal 700019 zbacllc@gmail.com 7/27/16

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Hon. Judge Laura Taylor Swain
US District Judge
US District Court of Southern of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Dear Hon. Judge Laura Taylor Swain:

This letter is in reference to the matter of Sadis & Goldberg, LLP vs. Sumanta Banerjee, 14-cv-00913. As you maybe aware, I am a *pro se* litigant with a permanent residence in Kolkata, India. I received the Plaintiff's Motion in Opposition to Motion to Vacate Default Judgement filed on April 26, 2016 on July 26, 2016 via email to <u>zbaclle@gmail.com</u>.

After speaking with Ms. Brown, in the *pro se* department I was advised that there are 14 days within which to file a response, but there remains some confusion as to whether it might actually be 7 or 10 days; as such I am requesting an extension until August 9, 2016 within which time I will file a response.

The additional time will be used so I can file a proper reply to (1) the Plaintiffs specious and completely misleading and erroneous statements (without any proof on my residency status) in order to circumvent the Hague Convention Rules (2) various other false and misleading claims on Service and the facts of the Pledge Agreement. The Plaintiff finally acknowledged the existence of a Pledge Agreement, after having been caught "red handed" in their attempt to mislead the Court on the authenticity of their claims that Banerjee owes Sadis legal fees. Further, the Plaintiff actually acknowledges "the zeroing out" of the legal fees with the Pledge Agreement in their latest filing. I will prove to the Court that I do not owe Sadis any legal fees and this entire case is meritless and has been an effort by Sadis and Hirsch to "circumvent" the Pledge Agreement, a contract that the Plaintiff drafted and executed in 2008. Lastly, I have yet to be served correctly under the Federal Rules of Civil Procedure.

I am respectfully requesting Your Honor to grant me the additional time, until Aug. 9, 2016, to file a proper response to the Plaintiff's motion.

Respectfully submitted,

Sumanta Banerjee

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